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January 20, 2000

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OFFICE OF THE SOCIETY AND

Magalie Roman Salas, Esquire
Secretary, Federal Communications Commission
Suite TW-A325
445 Twelfth Street, S.W.
Washington, DC 20554

Re: Notice of Ex Parte Presentation

Clarification of the Commission's Rules on Interconnection Between LECs and Paging Carriers, CCB/CPD No. 97-24 ("SWBT clarification request")

Implementation of the Local Competition Provisions of the Telecommunications Act of 1996, First Report & Order, CC Docket Nos. 96-98, 95-185 ("Local Competition First Report & Order")

Formal Complaint of TSR Paging Inc. against US West Communications Inc., File No. E-98-10 (filed December 24, 1997)

Formal Complaint of Metrocall against Various LECs, File Nos. E-98-14-18 (filed January 20, 1998)

Formal Complaint of Arch Communications Group, Inc. against US WEST Communications, Inc., File No. E-99-05 (filed December 3, 1998)

Formal Complaint of Arch Communications Group, Inc. against BellSouth Telecommunications, Inc., File No. E-99-06 (filed December 7, 1998)

Formal Complaint of MAP Mobile Communications, Inc. against US West Communications, Inc. File No. E-99-11 (filed March 4,1999)

Dear Ms. Salas:

On January 18, 2000, Mark Stachiw, a Vice President and Senior Counsel of AirTouch Paging ("AirTouch"), and the undersigned met in separate meetings with

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OUR FILE NO

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Ari Fitzgerald, Helgi Walker, Adam Krinsky, Peter Tenhula and Mark Schneider in the offices of Chairman Kennard and Commissioners Furtchgott-Roth, Tristani, Powell and Ness, respectively, to discuss LEC/paging interconnection issues. Rob Hoggarth of the Personal Communications Industry Association ("PCIA") joined in the meetings with Messrs. Fitzgerald and Krinsky.

AirTouch reported to the Commission that, although it has been able to reach interconnection agreements with multiple local exchange carriers, significant unresolved issues remain outstanding with U S WEST as evidenced by litigation of public record before the Federal District Court in Denver Colorado (the "Denver Court"). AirTouch also indicated that it has reached an interconnection agreement with SBC covering the state of California, but has yet to reach agreement with SBC in other non-Ameritech states in which the parties interconnect. (AirTouch entered into agreements with Ameritech prior to its merger with SBC).

AirTouch pointed out to the Commission that many of AirTouch's interconnection agreements with LECs reflect termination rates comparable to those paid to two-way Commercial Mobile Radio Service ("CMRS") carriers and comparable to the LECs' own termination rates, which AirTouch indicated was necessary to level the competitive playing field.

AirTouch advocated that the Commission stay the course that has been set with respect to LEC/paging interconnection in the Commission's First Local Competition Report, the Keeney Letter and the Metzger Letter, and asked the Commission to send consistent messages to the LECs that they act at their own peril if they disregard the FCC's pronouncements. AirTouch and PCIA further argued that the Commission should reject any and all efforts by the LECs to overturn or reduce the entitlement of paging carriers to terminating compensation and relief from charges for facilities used to deliver the LECs' own traffic to paging carriers for local termination.

AirTouch shared with the advisors the fact that U S WEST recently has taken the position before the Denver Court that the <u>Metzger Letter</u> is not a binding and effective action of the Commission despite clear FCC authority to the contrary and rulings by <u>both</u> the Washington Utilities and Transportation Commission and the Colorado Public Utilities Commission confirming that the <u>Metzger Letter</u> is a valid enforceable action by an authorized FCC delegate of authority.

The discussions touched upon a broad range of topics pertaining to the above-referenced LEC/paging interconnection proceedings. The positions taken by AirTouch and PCIA in these discussions were consistent with their positions of record in those proceedings. No written materials were presented at the meetings.

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Kindly refer any questions in connection with this matter to the undersigned.

Very truly yours,

Carl W. Northrop

of PAUL, HASTINGS, JANOFSKY & WALKER LLP

CWN:syc

cc: Ari Fitzgerald

Helgi Walker

Adam Krinsky

Peter Tenhula

Mark Schneider